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Bonnie Soriano
Angela Csondes
California Air Resources Board
1001 "I" Street
Sacramento, CA 95812

RE: Proposed Regulations Order, Title 17, 93130 - 93130.20 CCR

We are an international vessel owner and operator of Handysize and Supramax vessels, with 12 offices globally, and headquarters in Hong Kong. Pacific Basin Shipping are publicly traded on the Hong Kong Stock Exchange. On an annual basis, we have approximately 150 vessel calls to the state of California.

In regards to proposed at berth changes in regulations, we have the follow comments for your consideration.

Due to the "tramp" nature of bulk cargo trades (in comparison to container liner trading), we are not consistently calling to one berth only, but may call to various berths for undetermined periods of time. Our vessels may collect separate cargo parcels from more than one berth or port within California, as part of a typical voyage. A proposed "one-hour hook-up" is neither practical for a bulk vessel, nor for a bulk loading terminal. Bulk vessels and the terminals to which typically do not have the required infrastructure onboard or on the shore side to be compliance with this proposal. Also, what is called "line-hauling" is quite customary, whereby a vessel must shift along berth between hatches due to shore loading facilities do not have the ability to themselves shift along a berth. This shifting requires full use and readiness of vessels main engine, thereby questioning further to practicality of one-hour plug in's.

As a secondary, and perhaps more important comment, the impacts of further regulation would be substantial upon the people living in the state of California. The state of California economy relies upon the import and/or export of products such as grains, rice, cement, fertilizers, slag, steel, scrap, steel, coal, slag and aggregates to name just a few. Should these regulations prevent a bulk carrier from calling to a California port as a result of increased regulation, these cargoes shall be exported elsewhere, beyond the state boundaries of California.

While we understand and support efforts to reduce GHG emissions and the overall environmental impact of shipping, we urge that this is done in a practical manner. We remain at your disposal to discuss this matter further.

With best regards,



Simon Brown.
Senior Operations Manager
Pacific Basin Shipping (Canada) Ltd. On behalf of Pacific Basin Shipping Ltd.